

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: 4:15-cr-00868-RBH-2
)	
vs.)	MOTION FOR CONTINUANCE
)	
BRIAN KEITH PERDUE,)	
)	
Defendant.)	
)	

The Defendant, Brian Keith Perdue, by and through his undersigned counsel, does hereby move this Honorable Court for a continuance of the date for pre-trial conferences in this case. This matter is currently set for pre-trial on June 13, 2016. In support of the motion for continuance, counsel sets forth the following:

1. This Indictment in this case charges Mr. Perdue with violations of 18 U.S.C. § 1014 and 18 U.S.C. § 371, for conspiring to make false statements and overvaluing land and property for the purpose of influencing mortgage lenders.

2. Discovery is voluminous and includes over 4,000 pages of documents and images that are relevant to the case. Counsel has reviewed the discovery and is in the process of continuing to review discovery with Mr. Perdue. Mr. Perdue currently resides in Virginia and has traveled to appear for each meeting and pre-trial conference previously.

3. Mr. Perdue signed a proffer agreement and has been debriefed by the government in this case. Counsel participated in a meeting with Assistant United States Attorney, John Potterfield, and Federal Bureau of Investigation Agent, Torrance Bassard, on June 3, 2016, in an effort to clarify the loss amounts involved in this case and the method of calculation. A significant amount of work has been performed on the case and it continues to move towards a

resolution. Counsel anticipates that the case will be resolved prior to the next pre-trial conference.

4. Counsel is scheduled for trial next week in the Horry County Court of Common Pleas and jury qualification and selection in the case is scheduled for Monday morning, June 13, 2016, at 9:30 a.m., which is the same date of the pre-trial conference in this case.

5. Counsel has been in discussions with the Assistant United States Attorney, John Potterfield, regarding this motion for continuance and he consents to the case being continued to the next pre-trial conference date.

6. Counsel has explained to the Defendant his rights to a speedy trial under the Speedy Trial Act of 1974, 18 U.S.C. § 3161, *et seq.*, and he consents to the case being continued to the next pre-trial conference date as indicated below.

For the foregoing reasons, counsel respectfully requests that this case be continued from the pre-trial term of June 13, 2016 to the next pre-trial conference date.

My attorney has fully explained to me, and I fully understand my rights under the Speedy Trial Act and I freely and voluntarily waive my rights under the Speedy Trial Act of 1974, 18 U.S.C. § 3161, *et seq.*

A handwritten signature in black ink, appearing to read "Brian Keith Perdue", written over a horizontal line.

Brian Keith Perdue
Defendant

(Signature Page to Follow)

Respectfully submitted,

/s/Ashley B. Nance

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Brian Keith Perdue

Florence, South Carolina
June 8, 2016